

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Alfred Jordan Rushie and Megan M. Young,	:	
	:	
Plaintiffs,	:	
	:	Case No.: 2:20-cv-02773-MSG
v.	:	
	:	
Black and Gerngross, P.C., Claudia P. Black,	:	
Jenna Elise Rushie, Elizabeth Santry, AJ	:	
Delforge, The City of Philadelphia and John	:	
and Jane Does 1-20,	:	
	:	
Defendants.	:	

EMERGENCY MOTION OF DEFENDANTS BLACK & GERNGROSS, P.C., CLAUDIA P. BLACK, JENNA ELISE RUSHIE, ELIZABETH SANTRY AND AJ DELFORGE FOR A TEMPORARY RESTRAINING ORDER PURSUANT TO FED. R. CIV. P. 65(a) and (b) AND ORDER TO SHOW CAUSE WHY PRELIMINARY INJUNCTION SHOULD NOT ISSUE

Pursuant to Rule 65(a) and (b) of the Federal Rules of Civil Procedure, Defendants Black & Gerngross, P.C., Claudia P. Black, Jenna Elise Rushie, Elizabeth Santry and AJ Delforge (collectively, the “Moving Defendants”) hereby apply to this Court for a temporary restraining order (“TRO”). In support of the motion, Moving Defendants state as follows:

1. Moving Defendants bring this motion to halt Plaintiffs’ unfettered filing of abusive, harassing and irrelevant documents in connection with this Action.
2. This case has only been pending for about two weeks and Plaintiffs have already filed three complaint and six motions. The filings are for the most part intelligible, scant and scattered.

3. Moving Defendants therefore seek a TRO/preliminary injunction:
 - a. Temporarily restraining and enjoining Plaintiffs from filing any additional complaints or motions without first obtaining approval from the Court; and
 - b. Providing for other equitable relief as the Court deems appropriate.
4. Pursuant to Fed. R. Civ. P. 65(b), Defendant has provided actual notice to Plaintiffs as of the time of the making of this application, and has provided copies of all filings related to this Motion.
5. A memorandum in support of this Motion and proposed TRO are filed concurrently.

WHEREFORE, Moving Defendants respectfully request this Court grant this Motion by entering the proposed TRO.

Dated: Philadelphia, Pennsylvania
June 30, 2020

FOX ROTHSCHILD, LLP

By: /s/ Sidney S. Liebesman
Sidney S. Liebesman (PA ID# 75945)
sliebesman@foxrothschild.com
2000 Market Street, 20th Floor
Philadelphia, Pennsylvania 19103
Telephone: (215) 299-2000
Facsimile: (215) 299-2150

*Attorneys for Defendants
Black & Gerngross, P.C., Claudia P. Black,
Jenna Elise Rushie, Elizabeth Santry and AJ
Delforge*